

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

ROBYN WILSON, *et al.*,

Plaintiffs,

v.

BOOZ ALLEN HAMILTON INC., *et al.*,

Defendants.

Civil Action No. 1:23-cv-00043 (PTG) (IDD)

**DEFENDANT BOOZ ALLEN HAMILTON INC.’S
MOTION TO CONFIRM CONFIDENTIALITY DESIGNATIONS**

Defendant Booz Allen Hamilton Inc. (“Booz Allen”), through undersigned counsel, respectfully requests that the Court enter an order: (a) confirming Booz Allen’s designations of Highly Confidential material in certain portions of the contract (and all modifications) between Booz Allen and the United States Department of Agriculture (“USDA”) concerning Recreation.gov (“the Contract”), pursuant to the Protective Order, *see* ECF 32 ¶ 10; and (b) maintaining those portions of the Contract containing Booz Allen’s confidentiality designations under seal; and (c) granting such further relief as this Court may deem just and proper, for the reasons set forth in the accompanying memorandum of law, declaration of Jay Wooten, and declaration of Elie Salamon.

Dated: July 17, 2023

Respectfully submitted,

ARNOLD & PORTER KAYE SCHOLER LLP

/s/ Ian S. Hoffman

Ian S. Hoffman (VA Bar # 75002)

Sonia Tabriz (VA Bar # 85822)

601 Massachusetts Ave., N.W.

Washington, DC 20001-3743

Tel.: 202.942.5000

Fax: 202.942.5999

Ian.Hoffman@arnoldporter.com

Sonia.Tabriz@arnoldporter.com

Lori B. Leskin (*pro hac vice*)

Elie Salamon (*pro hac vice*)

250 West 55th Street

New York, NY 10019-9710

Tel.: 212.836.8000

Fax: 212.836.8689

Lori.Leskin@arnoldporter.com

Elie.Salamon@arnoldporter.com

Counsel for Defendant Booz Allen Hamilton Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of July 2023, I caused the foregoing to be filed electronically using the Court's CM/ECF system, which automatically sent a notice of electronic filing to all counsel of record.

/s/ Ian S. Hoffman

Ian S. Hoffman.